

FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

APR 10 2019

In the Matter of the Search of:

Case Number:

Magistrate Judge Sidney I. Schenkier  
United States District Courtthe USPS Priority Mail package bearing tracking  
number 9505 5162 4773 9098 3036 08, further  
described in Attachment A

19M237

## APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Vincent Humphrey, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

Code Section

Offense Description

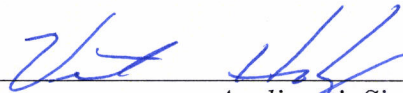
Title 21, United States Code, Section 843(b)

Narcotics

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.



Applicant's Signature

VINCENT HUMPHREY, Postal Inspector, U.S. Postal  
Inspection Service

Printed name and title

Sworn to before me and signed in my presence.

Date: April 10, 2019



Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge  
Printed name and title

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

**I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL**

5. On April 10, 2019, law enforcement inspected the **Subject Parcel** at USPS Chicago Bulk Mail Center in Forest Park, Illinois. The **Subject Parcel** was mailed on April 8, 2019, from Laguna Beach, California, 92652 and is addressed to “Daunyele Thompson, 25004 S Clare Cir, Manhattan, IL 60442,” with a return address of “Emmaunel Thompson, 210 Fern st Laguna Beach, CA 92651.” The **Subject Parcel** bears \$58.05 in postage, measures approximately 20 inches by 14 inches by 10 inches, and weighs approximately 18 pounds and 7.8 ounces.

6. Law enforcement observed characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. Law enforcement ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database. According to the database, the purported return address exists, but the purported sender is not associated with the listed address. In addition, there is a “Daunelle Thompson” associated with the recipient address, but it is spelled as “Daunyele Thompson” on the **Subject Parcel**. Based on my training and experience, fictitious sender or recipient names can indicate that the sender or recipient does not want to be associated with the parcel.

8. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on an officer’s training and experience,



however, the combination of these characteristics led the officer to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

9. On April 10, 2019, law enforcement arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Hannah," to meet with an officer and examine the **Subject Parcel**. According to the Canine Officer, Hannah is certified annually by United States Customs and Border Protection as a narcotics dog. Hannah was most recently re-certified on September 6, 2018. Hannah is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Hannah is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Hannah has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 164 occasions since December 2014, with a success rate of approximately 89%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

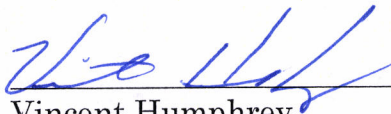
10. On April 10, 2019, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, law enforcement arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 10 other parcels in the workroom area. Law enforcement then witnessed Hannah examine the parcels

and observed Hannah alert by sitting next to the **Subject Parcel**. Hannah did not alert to any of the other parcels. The Canine Officer informed law enforcement that Hannah's actions indicated the presence of narcotics and/or controlled substances in the **Subject Parcel**. Law enforcement then took custody of the **Subject Parcel**.

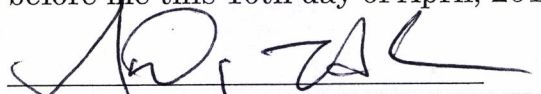
## II. CONCLUSION

11. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Vincent Humphrey  
Postal Inspector  
U.S. Postal Inspection Service

Subscribed and sworn  
before me this 10th day of April, 2019

  
\_\_\_\_\_  
Honorable SIDNEY I. SCHENKIER  
United States Magistrate Judge

**ATTACHMENT A**

**DESCRIPTION OF ITEM TO BE SEARCHED**

The USPS Priority Mail Parcel bearing tracking number "9505 5162 4773 9098 3036 08," a recipient address of "Daunyelle Thompson, 25004 S Clare Cir, Manhattan, IL 60442," and a return address of "Emmaunel Thompson, 210 Fern st Laguna Beach, CA 92651." The parcel measures approximately 20 inches by 14 inches by 10 inches, weighs approximately 18 pounds and 7.8 ounces, and bears \$58.05 in postage.

**ATTACHMENT B**

**LIST OF ITEMS TO BE SEIZED**

Evidence, instrumentalities, and contraband concerning violation of Title 21, United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States currency;
4. Items associated with controlled substances;
5. Items that identify the sender or receiver of the parcel; and
6. Any other items that are contained inside of the parcel that could be examined for evidence, such as latent fingerprints, of who has accessed the inside of the parcel or handled its contents.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

the USPS Priority Mail package bearing tracking  
number 9505 5162 4773 9098 3036 08, further  
described in Attachment A

Case Number: **19M237**

**SEARCH AND SEIZURE WARRANT**

To: Vincent Humphrey and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of  
the following person or property located in the Northern District of Illinois:

**See Attachment A**

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person  
or property described above, and that such search will reveal:

**See Attachment B**

**YOU ARE HEREBY COMMANDED** to execute this warrant on or before April 24, 2019 in the daytime (6:00  
a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property  
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the  
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an  
inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate  
Judge.

Date and time issued: April 10, 2019 4:24 PM

City and State: Chicago, Illinois

  
Judge's signature

SIDNEY I. SCHENKIER, U.S. Magistrate Judge  
Printed name and title



**Return**

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title*

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